

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AIRPRO DIAGNOSTICS, LLC, a
Florida limited liability company,

Case No. 22-cv-12969-LVP-EAS

Plaintiff,

Honorable Linda V. Parker

v.

Magistrate Judge: Elizabeth A. Stafford

DREW TECHNOLOGIES, INC., a
Michigan corporation, OPUS IVS,
INC., a Delaware corporation,
AUTOENGINEUTY, LLC, an Arizona
limited liability company, and BRIAN
HERRON, an individual,

Defendants.

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**CONSENT MOTION FOR LEAVE TO FILE
EXHIBIT USING THE MEDIA FILE**

NOW COMES the undersigned counsel for Defendants Drew Technologies, Inc., Autoengenuity, LLC, Opus IVS, Inc., and Brian Herron (collectively, “Defendants”), and pursuant to Rule 19(c) of the Electronic Filing Policies and Procedures, seeks leave of this Court to file a media file. If granted, the exhibit would be filed using the electronic portal called “Media File Upload” located in the ECF system and will be filed in accordance with Rule 19(c). In support of this Motion, Defendants state as follows:

1. The exhibit to be filed is an electronic video file (.MP4 file) containing a publicly available Youtube Interview titled ““The Autoengenuity Automotive Scantool.”

2. The media file provides factual support for Defendants’ position in their Motion for Summary Judgment (ECF No. 53) that certain “confidential” information at issue with respect to Plaintiff’s claim for breach of contract against Defendant Drew Technologies, Inc. was not confidential at the time of disclosure.

3. The media file has not been used in a court proceeding but may be used at any hearing on Defendants’ Motion for Summary Judgment and/or at the trial of this action.

4. The content of the media file complies with the privacy protections outline in the E-Government Act of 2002 and all other applicable law. There is not

any confidential or sensitive protected information that will need to be redacted in this filing.

The parties' counsel conferred with one another under L.R. 7.1(a) before Defendants filed this motion. Counsel for Defendants explained the nature of this motion and requested Plaintiff's concurrence in the relief sought. Plaintiff has indicated it consents to the leave sought.

For the foregoing reasons, the undersigned respectfully requests that this Court grant the leave sought in this motion.

Respectfully submitted,

Date: February 21, 2025

BY: /s/ Samuel A. Slater
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CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record at their respective email addresses as registered with same.

HOOPER HATHAWAY, P.C.

By: /s/ William J. Stapleton
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